

In the matter of
Numbering resource Optimization }

CC Docket 99-200

CC docket 96-98

February 10, 2001

REQUEST TO DENY BELL SOUTH'S REQUEST FOR EXTENTION
OF UTILIZATION THRESHOLD REPORTING

Peggy Arvanitas of Clearwater, florida, consumer advocate and party to this docket hereby asks that BellSouth be denied ANY extension from utilization threshold reporting and being able to continue to receive numbers (NXX's) during this period for the parent company and any subsidiaries not reporting. As all other carriers were given the same minimum six month reporting time frame to upgrade network software, it should not be acceptable to FCC nor should FCC allow neustar to continue releasing NXX codes to bellsouth during this period of non-compliance. BellSouth is a major ILEC in the united states, and with 10% profits reported, this consumer Advocate finds this unacceptable. The continuation of excuses for BellSouth's excuses are well known in florida and shouldn't be tolerated by the FCC for two reasons:

- 1) If a major ILEC is offered exclusions, what awful precedent's set for proper enforcement for other carriers?
- 2) NXX's being allocated without utilization thresholds, especially in Florida is wreckless, since we already have 5 area codes in jeopardy relief. since BellSouth uses more than 40% of those area code numbers, any allocation ignoring the FCC 00-104 order would not be "competitively neutral" , in violation of the 1996 telecom Act.

therefore, as a consumer, and since these are the Public's numbers, I am asking the FCC to stop putting the billion dollar phone companies before the consumers. I am

asking the FCC to demand neustar, since this company is under your authority, to cease and desist the allocation to Bellsouth's parent company and subsidiaries. There should be no numbers allocated from Neustar to BellSouth during the period where they are in violation of FCC 00-104 and related Reconsiderations dealing with utilization thresholds and subsequent deadlines. BellSouth's lack of planning and blatant disregard for deadlines is not the FCC's concern, especially when they have no problem spending money on their NAP in Florida. They should not get to pick and choose what cost allocations they feel like being in compliance with, at their convenience.


A Very unhappy consumer,

Peggy Arvanitas

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Certificate of service

I do hereby certify that I have this 10th day of february 10, 2001, served the following parties to this action with a copy of the foregoing REQUEST TO DENY BELLSOUTH'S REQUEST FOR EXTENSION, REFERENCE CC docket 99-200, by mail, addressed to the parties as set forth on the attached service list.



Peggy Arvanitas, consumer advocate

certificate of service
CC docket 99-200
February 10, 2001

CERTIFICATE OF SERVICE -fcc 99-200

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